

Remarks

In the Office Action, the Examiner:

1. Rejected Claim 5 as anticipated by Tamura (U.S. Patent No. 5,130,804) under 35 U.S.C. § 102(b);
2. Rejected Claim 1 and 9 under 35 U.S.C. § 103(a) as obvious over Tamura in view of Mogamiya (U.S. Patent App. No. 20010007475);
3. Rejected Claims 2 and 3 under 35 U.S.C. § 103(a) as obvious over Tamura in view of Mogamiya and further in view of Ackland;
4. Rejected Claim 4 under 35 U.S.C. § 103(a) as obvious over Tamura in view of Mogamiya and further in view of Tullis (U.S. Patent No. 6,535,243);
5. Rejected Claim 6 and 7 under 35 U.S.C. § 103(a) as obvious over Tamura in view of Ackland;
6. Rejected Claim 8 under 35 U.S.C. § 103(a) as obvious over Tamura in view of Tullis.

Applicants respectfully traverse.

Applicants respectfully submit that the Examiner has not made a prima facie case of obviousness. Specifically, Tamura, which is used as a reference in rejecting all of the pending claims, does not disclose a sensor package as argued by the Examiner. The Examiner asserts that the sensor package is "CCD 17" in Figure 1. Applicants respectfully submit that "CCD 17" is a CCD chip having an imaging surface 33. The CCD chip 17 in Figure 1 of Tamura is not contained in any sensor package as recited in the pending claims. Applicants respectfully submit that Tamura does not disclose or suggest placing a chip of a solid state image element *in a sensor package*.

With respect to the Examiner's combination of Tamura and Magomiya, the Examiner has not pointed out where in either Tamura or Magomiya there is a suggestion to combine the references to arrive at the invention. The Examiner argues that Magomiya discloses an "opening" as recited in claim 1. However, the opening in claim 1 is to a circuit board. Magomiya does not disclose or suggest using a circuit board at all. Applicants respectfully submit that the Examiner has resorted to hindsight analysis in combining Tamura with Magomiya. Magomiya does not teach or suggest mounting an image pickup device at an opening in a circuit board and, neither Magomiya nor Tamura suggest using a glass cover to protect the image pickup device.

Applicants respectfully submit that Claims 1-9 are in condition for allowance.

Favorable reconsideration is respectfully requested.

Respectfully submitted,

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